

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PACIFIC INDEMNITY COMPANY,

Plaintiff,

v.

ALFRED KEMP, Individually and d/b/a
KEMP PLUMBING

and

MARTIN SANDBORG, Individually and d/b/a
SANDBORG PLUMBING AND HEATING,

Defendants.

CIVIL ACTION NO.

04-11975(RWZ)

JOINT STATEMENT

PURSUANT TO L. R. 16.1(D)

The undersigned counsel for the parties hereby submit the following proposed Pretrial Schedule:

1. Initial Disclosures pursuant to F.R.C.P. 26(a)(1) shall be submitted no later than January 15, 2005. No party may serve discovery requests or otherwise initiate discovery proceedings until after that party has served Initial Disclosures.
2. Plaintiffs' Expert Disclosures pursuant to F.R.C.P. 26(a)(2) shall be submitted by June 30, 2005.
3. Defendants' Expert Disclosures pursuant to F.R.C.P. 26(a)(2) shall be submitted by August 31, 2005.
4. All discovery shall be completed by October 30, 2005.
5. All motions shall be filed by October 30, 2005.

Respectfully submitted,

PACIFIC INDEMNITY COMPANY

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Dated 12/8/04

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